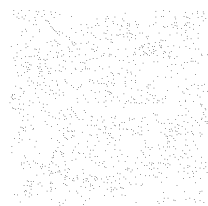


**To:** Enck, Judith[Enck.Judith@epa.gov]  
**Cc:** Evangelista, Pat[Evangelista.Pat@epa.gov]; Filippelli, John[Filippelli.John@epa.gov]; Iglesias, Ariel[Iglesias.Ariel@epa.gov]; Everett, Adolph[Everett.Adolph@epa.gov]  
**From:** Azzam, Nidal  
**Sent:** Thur 7/28/2016 5:09:14 PM  
**Subject:** Addressing your Request on Taconic Facility in Petersburg



Judith,

At your request, Pat reached out to me requesting me to touch base with Thomas Gentile (NYSDEC, Air Toxics Section Chief) regarding the Taconic facility in Petersburg, the concerned citizen over her PFOA blood level and her claim over the potential exposure pathway via historical air emissions. The scope of the request is to obtain more details about the facility type of operations, scope of the historical air sampling, and propose sampling from the interior surface(s) of the exhaust (or emission point post filtration). The discussion was very lengthy and detailed. Below is a summary.

• In 1997, NYSDEC had concerns about the facility operations where the facility had no controls on their emissions or oven temperatures. **Intense polluted smoke used to cover the valley where it would sting Tom's eyes. They were burning the teflon.** The facility has large coating lines with fiber-glass cloth liners running through vertical fired ovens, where the fiber glass is impregnated with PTFE. Then it is run through dip coating lines, heat zones, and gradually cure. The top heat zone is the center zone where the high heat occurs and the dangerous decomposition products come off. If it is heated too much, hydrogen fluoride is generated. NYSDEC argued with the facility over the lack of control in 1997. The facility invested \$150k to bring the emissions into compliance. Later, the facility decided to add a new adhesive line into the process without obtaining a permit from NYSDEC and operated it without controls. NYSDEC later found out about the adhesive line, and the Commissioner issued a \$100k fine to the facility in/circa 1999. Currently, the facility operates in a very clean manner. **Judith – the process at this facility appears to be the same or very similar to the process at Saint Gobain in New Hampshire where the NH state issued an AOC to the facility for exceeding the State Air Toxics limit for PFOA emissions.**

• NYSDEC performed stack tests on a number of emission points (i.e., adhesive lines, PTFE lines, etc.). They have tested primarily for PTFE decomposition products/poisonous gases (i.e., some organics, benzene, toluene, NOX, etc). Hydrogen Fluoride was the major concern at that time. **The testing did not include PFOA or PFAS parameters. Tom indicated that a historical MSDS sheet showed the PTFE product as containing 0.5% PFOA).**

• I have asked Tom about the operating temperatures. He indicated that the temperature went up as high as 785°F with average temperatures below 700 °F. I do know that to fully destroy the PFOA by burning, the temperature needs to be around 1100°F. Tom Indicated that he believes that the majority of the PFOA ended up in the waste water and filters. **Final disposition of historical PFOA containing waste water and filters is currently unknown.** I did indicate to Tom that the process at this facility is similar to the Saint Gobain in NH and he agreed. I have made him aware of the NH AOC on PFOA emissions and the trace amounts of PFOA found in air emissions at the other facility in Vermont (I believe) after years of phasing out of PFOA usage. ***Tom indicated that PFOA air emission more likely occurred at the facility prior to having controls in place. I have suggested to him to collect a particulate sample from the interior surfaces of the emission point post filtration to assess an potential historical PFOA air emissions. He indicated that he will take this into consideration and consult with his chemist on this matter.***

I did give Tom my contact information in case he wants to reach out to me and brainstorm on PFAS matters. I hope the above addresses your request.

Nidal Azzam,  
Base Program Management Section, Chief

Hazardous Waste Programs Branch

Clean Air and Sustainability Division

USEPA Region 2  
290 Broadway, 22nd Floor  
New York, NY 10007  
212-637-3748 Office  
212-637-4437 Fax



